



Memo Endorsed

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June 11, 2020

VIA ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: Nago v. Bloomberg L.P., Case No. 19-CV-11483 (GBD) (OTW)

Dear Judge Wang:

This firm represents defendant Bloomberg L.P. (“Bloomberg”) in the above-captioned matter. We submit this letter to request an extension of time to file Bloomberg’s reply brief in support of its Motion to Dismiss Certain Claims in the Amended Complaint, and to request an extension of the deadlines set forth in Your Honor’s Order, dated May 26, 2020 (ECF No. 24).

On May 21, Bloomberg filed a Motion to Dismiss Certain Claims in the Amended Complaint (*see* ECF Nos. 21-23). On June 3, Plaintiff requested a four-week extension to file his opposition brief (ECF No. 25), which Your Honor granted and Plaintiff’s opposition brief is currently due by July 2 (ECF No. 26). Pursuant to S.D.N.Y. Local Rule 6.1, any reply memoranda of law must be served within seven days after service of Plaintiff’s opposition brief (*i.e.*, by July 9). Due to the July 4th holiday, Bloomberg respectfully requests one additional week to submit its reply brief, thus extending the deadline from July 9, 2020 to July 16, 2020.

Further, in light of this briefing schedule extension, Bloomberg respectfully requests that the deadlines set forth in Your Honor’s Order, dated May 26, 2020 (ECF No. 24), be adjusted as follows:

- (1) the deadline for filing the parties’ updated proposed case management plan be reset from June 23, 2020 to July 21, 2020; and
- (2) the parties’ telephonic status be rescheduled from June 30, 2020 to July 28, 2020 or August 4, 2020.

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This is Bloomberg's first request for an extension to file its reply brief in support of its Motion to Dismiss Certain Claims, and its first request for an extension of the deadlines set forth in Your Honor's May 26 Order. Plaintiff consents to these requests.

Thank you for Your Honor's courtesies in this matter.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

By: /s/ David W. Garland
David W. Garland

cc: Damon Nago, *pro se* (via ECF)

Application Granted.

The status conference scheduled for June 30 is adjourned to August 4, 2020 at 2:30 p.m.

SO ORDERED.



Ona T. Wang
U.S. Magistrate Judge

6/12/2020